

**STEWART LEE KARLIN LAW GROUP, P.C.**  
**Stewart Lee Karlin, Esq.**  
**111 John Street, 22<sup>nd</sup> Floor**  
**New York, New York 10038**  
**(212) 792-9670/Office**  
**(212) 732-4443/Fax**  
**[slk@stewartkarlin.com](mailto:slk@stewartkarlin.com)**

MEMBER OF THE BAR  
NEW YORK & FLORIDA

Concentrating in Employment, Education and  
Insurance Law

Website: [www.stewartkarlin.com](http://www.stewartkarlin.com)

January 13, 2021

**Via ECF**

Honorable Denise Cote  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1910  
New York, NY 10007

**MEMO ENDORSED**

**Re: Greenbaum v. New York City Transit Authority et al.**  
**20 CV 771 (DLC)**

Dear Judge Cote:

In accordance with this Court's Individual Practice rules, Plaintiff is requesting an extension of time to submit a Summary Judgment Motion from January 22, 2021 to February 5, 2021, extend the response time for opposition papers from February 12, 2021 to February 26, 2021 and extend the response time for reply papers from February 26, 2021 to March 12, 2021. Defendants' counsel has graciously *consented* to the request. This is the second request by any party for an extension regarding the summary judgment deadline.

Both parties intend on filing a summary judgment deadline. The reason for the request is that Counsel for the Plaintiff has contracted Covid with the onset of symptoms first appearing on December 30, 2020 and the diagnosis on January 4, 2021. I am recovering from Covid which has taken me out of the office. I am only now beginning work in a limited capacity and hopefully be back to close to full-time by January 25, 2021.

Thus, Plaintiff respectfully requests the following schedule:

1. Deadline to file Summary Judgment Motions-February 5, 2021;
2. Deadline to serve opposition papers-February 26, 2021;
3. Deadline to file reply papers-March 12, 2021.

Thank you for your consideration herein.

Very truly yours,

s/Stewart Lee Karlin  
STEWART LEE KARLIN

cc: Miriam J. Manber, Esq. via ECF

Any motion by the defendants for summary judgment remains due January 22, 2021. If such motion is made, then the opposition is due February 12, and the reply is due February 26.

In the event the defendants do not move for summary judgment on January 22, then the joint pretrial order in this action shall be filed on February 5.

01.14.21.

  
\_\_\_\_\_  
DENISE COTE  
United States District Judge